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Attorneys for Defendant Tyler
Technologies, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

VBCONVERSIONS LLC, a California
limited liability company,

Plaintiff,

vs.

TYLER TECHNOLOGIES INC., a
Delaware Corporation; and DOES 1-10,
inclusive,

Defendant.

CASE NO. 2:14-cv-02072-R-VBK

Assigned to Hon. Manuel L. Real

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT; [PROPOSED]
ORDER**

Complaint Served: June 9, 2014
Current Response Date: July 30, 2014
New Response Date: August 29, 2014

1 Defendant TYLER TECHNOLOGIES, INC. (“Tyler”) and Plaintiff
2 VBCONVERSIONS, LLC (“VBConversions”) (collectively, the “Parties”) hereby
3 enter into this Stipulation to Extend Time to Respond to the Initial Complaint with
4 reference to the following facts:

5 Whereas, Tyler was served with the initial Complaint in this case on June 9,
6 2014, and its response would therefore ordinarily be due by June 30, 2014;

7 Whereas, Tyler and VBConversions previously entered into two stipulations
8 extending the time for Tyler to answer, move, or otherwise respond to the initial
9 Complaint by a total of thirty (30) days through and including July 30, 2014 and
10 Tyler reserved all rights, including the right to contest venue and jurisdiction (DE
11 11, 15);

12 Whereas, Tyler and VBConversions have reached a settlement in principle,
13 subject to the preparation and execution of a written settlement agreement. The
14 Parties expect to prepare and execute the written settlement agreement and file a
15 stipulation for dismissal of the entire action with prejudice within the next thirty
16 (30) days;

17 Whereas, this action is not yet fully at issue. The Court has not yet set a trial
18 date or scheduling conference. The Parties have not previously requested an
19 extension from the Court and have only extended the responsive deadline for thirty
20 day pursuant to Local Rule 8-3;

21 Now, therefore, good cause appearing, Tyler and VBConversions, by and
22 through their respective counsel of record, hereby stipulate and respectfully request
23 the Court extend the time for Tyler to answer, move, or otherwise respond to the
24 initial Complaint thirty (30) days, through and including August 29, 2014 in order
25 for the parties to prepare and execute the written settlement agreement. Tyler again
26 reserves all rights, including rights to contest venue and jurisdiction.

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1 All signatories listed, and on whose behalf the filing is submitted, including
2 that below, concur in the filing's content and have authorized the filing.

3 DATED: July 30, 2014 K&L GATES LLP

4 By: /s/
5 Seth A. Gold
6 Christina N. Goodrich
7 Attorneys for Defendant Tyler
Technologies, Inc.

8 DATED: July 30, 2014 LEWIS BRISBOIS BISGAARD & SMITH LLP

9 By: /s/
10 Joshua S. Hodas
11 Attorneys for Plaintiff VBConversions
12 LLC
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